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VIA ECF

Hon. Sarah L. Cave
United States District Court
Daniel Patrick Moynihan United States Courthouse
Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007-1312

Re: Consent Letter-Motion for Extension of Time for the Parties to Complete Expert Discovery in *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC (S.D.N.Y.)

Dear Magistrate Judge Cave:

We represent Cable News Network, Inc. (“CNN”) in the above-captioned matter. On behalf of the parties, we respectfully request an extension of the parties’ expert discovery deadlines. On February 21, 2023, the Court ordered the parties to (1) exchange expert disclosures required by Federal Rule of Civil Procedure 26(a)(2) for principal expert reports on Monday, April 24, 2023; (2) exchange rebuttal expert disclosures on Monday, May 8, 2023; and (3) complete expert depositions by May 18, 2023. ECF No. 122. The Court also ordered that all fact and expert discovery be completed by May 18, 2023, and directed the parties to file a joint letter certifying that all discovery is complete by May 25, 2023. *Id.*

The parties request an extension of the parties’ expert discovery deadlines to the following dates:

- **May 24, 2023:** Deadline to exchange expert disclosures
- **June 9, 2023:** Deadline to exchange rebuttal expert disclosures
- **June 23, 2023:** Deadline to complete expert depositions and complete expert discovery
- **June 30, 2023:** Deadline to file a joint letter certifying that all discovery is complete

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The parties request this additional time because each party's experts require more time to render their opinions. One of CNN's experts is experiencing a significant family emergency that renders her unable to complete her expert report by the deadline. One of Plaintiffs' experts requires more time due to his case load and travel schedule. Accordingly, each side is experiencing hardship in complying with the current deadline. Amending the above dates will provide sufficient time for this expert-related discovery and to prepare dispositive motions.

The parties have not previously requested an extension of time in connection with these expert discovery deadlines. The parties' May 18 close of fact discovery deadline would remain in effect. Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/ Katherine M. Bolger

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